EQ CHAPTER \h \r 1]**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY**
REGION 6
1445 ROSS AVENUE, SUITE 1200
DALLAS, TX 75202-2733

February 6, 2019

MEMORANDUM

Subject: Lane Plating – comments on the Sampling and Analysis Plan

From: Jon Rauscher, Ph.D.
Environmental Scientist

To: Kenneth Shewmake
Remedial Project Manager

The memorandum provides general and specific comments on the Sampling and Analysis Plan (SAP) for Remedial Investigation for the Lane Plating site located in Dallas, TX.

General Comments:

1. The SAP should consistently use either the term "groundwater" or "ground water" rather that switching back and forth. My preference is to use the term "groundwater."

2. Due to the potential for cyanide related waste at the Lane Plating site, the frequency of cyanide analysis should be increased from 10% to potentially 100% for groundwater, soil, surface water and sediment sampling.

Specific Comments:

1. Page 14 of 62, Table 2, Data Quality Objectives, Step 5: Which specific "screening levels" will be used as the comparison values for groundwater, soil, surface water and sediment?
    a. Will soil levels be screening against a value presented in Table D-1A (Screening Criteria for Soil and CLP Reference Limits) and Table D1B (Screening Criteria for Soil and Private Laboratory Reference Limits)?
    b. Will groundwater levels be screening against a value presented in Table D-2A (Screening Criteria for Ground Water and CLP Reference Limits) and Table D-2B (Screening Criteria for Ground Water and Private Laboratory Reference Limits)?
    c. Will sediment levels be screening against a value presented in Table D-3A (Screening Criteria for Sediment and CLP Reference Limits) and Table D-3B (Screening Criteria for Sediment and Private Laboratory Reference Limits)?
    d. Will surface water levels be screening against a value presented in Table D-4A (Screening Criteria for Surface Water and CLP Reference Limits) and Table D-4B (Screening Criteria for Surface Water and Private Laboratory Reference Limits)?

2. Page 32 of 62, Table 7. Frequency of Field Quality Control Samples: Matrix spike/matrix spike duplicate samples are being collected for organic and inorganic chemicals, not just organics (Sections 2.3.12 and 2.3.13).

3. Page 47 of 62, Section 2.5.1 Field Analytical Methods: Dissolved oxygen (DO) content should be monitored in groundwater and surface water. DO could become biologically significant in the surface water analysis.

4. Appendix A (Sampling Design Matrix), Table A-1 through Table A-4: Due to the potential for cyanide related waste at the Lane Plating site, the frequency of cyanide analysis should be increased from 10% to potentially 100%.